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9 Attorney for  
10 VAHE TASHJIAN, INDIVIDUALLY

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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

In re  
DUTCHINTS DEVELOPMENT, LLC  
Debtor.

Case No.: 21-51255 MEH  
Chapter 7  
MOTION TO WITHDRAW AS ATTORNEY  
OF RECORD FOR RESPONSIBLE  
INDIVIDUAL VAHE TASHJIAN;  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT

Hearing:  
Date: TBD  
Time: TBD  
Location: Courtroom 11  
280 S. First Street  
San Jose, CA

Hon. M. Elaine Hammond

TO THE HONORABLE M. ELAINE HAMMOND, UNITED STATES BANKRUPTCY  
JUDGE:

Vinod Nichani (“Counsel”), counsel for Vahe Tashjian, individually, hereby moves the  
above-entitled Court for an Order Authorizing Withdrawal of Counsel. Vahe Tashjian  
 (“Tashjian”) is the responsible individual for the Debtor herein.

1           This Motion is made and based upon: this Motion and Memorandum of Points and  
2 Authorities, and the Declaration of Vinod Nichani, and other such argument, authority and  
3 evidence as may be presented at the hearing.

4           This Motion is made pursuant to California Rule of Professional Conduct 1.16(b)(4), on  
5 the grounds that certain irreconcilable differences have arisen between Tashjian and Counsel and  
6 that Counsel cannot represent Tashjian further in this matter.  
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8           To that end, Vinod Nichani respectfully represents:

9           **I. BACKGROUND**

10          On September 29, 2021, the Debtor herein Dutchints Development LLC (“Dutchints”)  
11 filed voluntary petition under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy  
12 Code”), thereby commencing the above-captioned case (Dkt. 1). On October 25, 2021, by order  
13 of this Court, the designation of Tashjian as Responsible Individual for the Debtor was approved  
14 (Dkt. 35). By order dated November 9, 2021, the Court approved Dutchints’ retention of Geoff  
15 Wiggs dba Law Offices of Geoff Wiggs to represent Dutchints (Dkt. 53). By order dated October  
16 25, 2021, Mr. Vahe Tashjian, Managing Member of Dutchints, was designated Responsible  
17 Individual for Debtor (Dkt. 35).

18          The Debtor is currently not represented by counsel. A substitution of counsel was filed on  
19 January 11, 2022 (Dkt. 91) and approved by court order on January 20, 2022 (Dkt. 108),  
20 substituting in Iaian A. Macdonald of Macdonald Fernandez LLP as new counsel for Debtor,  
21 replacing Dutchints’ original attorney, Geogg Wiggs of Law Offices of Geoff Wiggs. On April  
22 20, 2022, Macdonald submitted his Motion to Withdraw as Counsel for the Debtor (Dkt. 171).  
23 By order on April 28, 2022 (Dkt. 181), Macdonald’s motion was granted, providing that  
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1 Macdonald continue representing Debtor until the earliest to occur of either Debtor's retention of  
2 new counsel, or May 18, 2022. To date, Debtor has not retained new counsel.

3 Upon Motion by the U.S. Trustee to Appoint Chapter 11 Trustee Under 11 U.S.C.  
4 1104(a), or the Alternative, to Convert to Chapter 7 Pursuant to 11 U.S.C. 112(b) (Dkt. 95) and  
5 by order dated February 11, 2022, the Court converted the within case from chapter 11 to one  
6 under chapter 7 (Dkt. 127). An Interim Chapter 7 Trustee was appointed on February 11, 2022  
7 (Dkt. 128).

8 On or about May 17, 2022, Nichani filed a Notice of Appearance and Request for Notice  
9 (Dkt. 199) for Tashjian. For the reasons explained below, Nichani now seeks to withdraw as  
10 counsel for Tashjian under California Rule of Professional Conduct 1.16(a)(4); 1.16(b)(4); and  
11 1.16(b)(6).

12 **II. California Rule of Professional Conduct 1.16**

13 A. Rule 1.16(a)(4) of the California Rules of Professional Conduct states: "Except as stated  
14 in paragraph (c), a lawyer shall not represent a client or, where representation has commenced,  
15 shall withdraw from the representation of a client if... (4) the client discharges the lawyer."  
16 California Rule of Professional Conduct 1.16(a)(4).

17 On September 29, 2022, Nichani filed a Substitution of Attorney and [Proposed] Order  
18 Thereon for Tashjian (Dkt. 261), whereby Tashjian consents to Nichani's withdrawal. Due to the  
19 incorrect procedure of terminating representation, Nichani has filed this a motion. A copy of the  
20 Substitution of Attorney is attached to the Declaration of Nichani in Support as **Exhibit "A."**

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1           B. Rule 1.16(b)(4) of the California Rules of Professional Conduct states: “Except as stated  
2 in paragraph (c), a lawyer may withdraw from representing a client if... (4) the client by other  
3 conduct renders it unreasonably difficult for the lawyer to carry out the representation  
4 effectively...” California Rule of Professional Conduct 1.16(b)(4).

5           It unreasonably difficult for Nichani to carry out his representation effectively in this  
6 matter. Irreconcilable differences have arisen between Tashjian and Nichani, and the attorney-  
7 client relationship has irreparably broken down despite efforts to repair and maintain such  
8 relationship. Due to the attorney-client privilege, Nichani is unable to further expand on the  
9 difficulties related to representation.

10           C. Rule 1.16(b)(6) of the California Rules of Professional Conduct states: “Except as stated  
11 in paragraph (c), a lawyer may withdraw from representing a client if... (6) the client knowingly  
12 and freely assents to termination of the representation...” (asterisks omitted) California Rule of  
13 Professional Conduct 1.16(b)(6).

14           As outlined above, Tashjian freely assents to termination of the attorney-client  
15 relationship, as demonstrated by his execution of the September 29, 2022 Substitution of  
16 Attorney.

17           D. California Rule of Professional Conduct 1.16(d) states: “A lawyer shall not terminate a  
18 representation until the lawyer has taken reasonable steps to avoid reasonably foreseeable  
19 prejudice to the rights of the client, such as giving the client sufficient notice to permit the client  
20 to retain other counsel, and complying with paragraph (e).” (asterisks omitted).

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1 California Rule of Professional Conduct 1.16(e) states:  
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3       1) subject to any applicable protective order, non-disclosure agreement, statute or  
4       regulation, the lawyer promptly shall release to the client, at the request of the  
5       client, all client materials and property. "Client materials and property" includes  
6       correspondence, pleadings, deposition transcripts, experts' reports and other  
7       writings, exhibits, and physical evidence, whether in tangible, electronic or other  
8       form, and other items reasonably necessary to the client's representation, whether  
9       the client has paid for them or not; and  
10      2) the lawyer promptly shall refund any part of a fee or expense paid in advance that  
11       the lawyer has not earned or incurred. This provision is not applicable to a true  
12       retainer fee paid solely for the purpose of ensuring the availability of the lawyer  
13       for the matter.

14 California Rule of Professional Conduct 1.16(e) (asterisks omitted).

15       Nichani has taken reasonable steps to avoid reasonably foreseeable prejudice to the right  
16       of the Tashjian. Tashjian may seek new counsel if he wishes to do so.

17       Lastly, Nichani will comply with California Rule of Professional Conduct 1.16(e), and  
18       Tashjian is aware that he will.

19       Therefore, pursuant to Rule 1.16 of the California Rules of Professional Conduct,  
20       Nichani is permitted to withdraw as counsel for Tashjian.

21 **III. Future Mailings**

22       Nichani requests that all further notices, pleadings, process and other papers addressed to  
23       Tashjian be served by mail to the following address:

24       Vahe Tashjian  
25       901 Loyola Dr.  
26       Los Altos, CA 94024

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1           **IV. Conclusion**

2           WHEREFORE, Vinod Nichani of Nichani Law Firm prays for entry of an order  
3           permitting Nichani to withdraw as counsel for Vahe Tashjian, and for such other and further  
4           relief as is appropriate in the premises.

5           Dated: October 4, 2022

6           NICHANI LAW FIRM

7           /s/ Vinod Nichani  
8           VINOD NICHANI  
9           Attorney for Vahe Tashjian, Individually



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Attorney for  
VAHE TASHJIAN, INDIVIDUALLY

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

In re  
DUTCHINTS DEVELOPMENT, LLC  
Debtor.

Case No.: 21-51255 MEH

Chapter 7

DECLARATION OF VINOD NICHANI IN  
SUPPORT OF MOTION TO WITHDRAW AS  
ATTORNEY OF RECORD FOR  
RESPONSIBLE INDIVIDUAL VAHE  
TASHJIAN

## Hearing:

Date: TBD  
Time: TBD  
Location: Courtroom 11  
280 S. First Street  
San Jose, CA

Hon. M. Elaine Hammond

J. Vinod Nichani, declare:

1. I am an attorney dba Nichani Law Firm and counsel of record for Vahe Tashjian herein (“Tashjian”). The following facts are true and correct of my own personal knowledge. If called upon as a witness, I would and could competently testify as follows:
  2. Vahe Tashjian (“Tashjian”) is the responsible individual for the Debtor herein.

1           3. On or about May 17, 2022, I filed a Notice of Appearance and Request for Notice (Dkt.  
2           199) for Tashjian.

3           4. I now seek to withdraw as counsel for Tashjian. On September 29, 2022, I filed a  
4           Substitution of Attorney and [Proposed] Order Thereon for Tashjian (Dkt. 261), whereby  
5           Tashjian consents to my withdrawal, and that Tashjian intends to proceed pro se. The  
6           Substitution of Attorney is attached hereto as Exhibit "A". The Court informed me that a motion  
7           to withdraw as counsel was the correct procedure.

9           5. It is unreasonably difficult for me to carry out representation of my client effectively, due  
10           in part to irreconcilable differences between Tashjian and I, causing an irreparable breakdown in  
11           the attorney-client relationship. Due to the attorney-client privilege, I am unable to further  
12           expand on the difficulties related to representation.

14           6. Tashjian freely assents to termination of the attorney-client relationship, as demonstrated  
15           by his execution of the September 29, 2022 Substitution of Attorney.

16           7. I have taken reasonable steps to avoid reasonably foreseeable prejudice to the right of the  
17           Tashjian. Tashjian may seek new counsel if he wishes to do so.

19           8. I will comply with California Rule of Professional Conduct 1.16(e), and Tashjian is  
20           aware that I will.

21           9. On October 4, 2022, I further informed Tashjian of my intent to file a motion to  
22           withdraw. Tashjian has not yet responded.

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1 I declare under penalty of perjury under the laws of the United States that the foregoing is  
2 true and correct, that I am over the age of eighteen, and that this declaration is executed on  
3 October 4, 2022 at San Jose, California.

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6 /s/ Vinod Nichani  
7 VINOD NICHANI  
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NICHANI LAW FIRM  
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## EXHIBIT A

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17 **UNITED STATES BANKRUPTCY COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

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20 In re  
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22 DUTCHINTS DEVELOPMENT, LLC  
23  
24 Debtor.

25 Case No.: 21-51255 MEH  
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27 Chapter 7  
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29 SUBSTITUTION OF ATTORNEY; ORDER  
30 THEREON

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## II. NEW REPRESENTATION

The party (Vahe Tashjian), represented by attorney seeking to withdraw, has not retained new counsel and wishes to proceed pro se, as a self-represented litigant.

Name: Vahe Tashjian

Address: 901 Loyola Drive, Los Altos, CA 94024

Telephone: 650-245-0753

Email:

### III. SIGNATURES

Withdrawing Attorney:

I am currently counsel of record in this case, and am identified above in Section I as "Withdrawing Attorney."

Date: September 29, 2022

/s/Vinod Nichani

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VINOD NICHANI

**Party Represented by Withdrawing Attorney:**

I am currently represented by the Withdrawing Attorney listed above. I consent to the withdrawal of my current counsel and represent myself pro se in this case.

Date: September 29, 2022

/s/Vahe Tashjian

VAHE TASHJIAN

## ORDER

GOOD CAUSE APPEARING, the substitution of Vahe Tashjian, Pro Se, in the place of  
Vinod Nichani of Nichani Law Firm, in respect to the representation of Vahe Tashjian, is  
APPROVED.

Date: \_\_\_\_\_

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UNITED STATES BANKRUPTCY  
COURT JUDGE

**NICHANI LAW FIRM**  
111 N. Market Street, Suite 300  
San Jose, California 95113